



Connecticut Farm Bureau Association

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Submitted by: Henry N. Talmage, Executive Director, Connecticut Farm Bureau Association, a statewide nonprofit membership organization representing 5,000 families dedicated to farming and the future of Connecticut agriculture.

Senator Bartolomeo, Representative Urban and members of the Committee on Children,

In opposition to:

Raised Bill No. 5300 AN ACT CONCERNING THE USE ON GENETICALLY MODIFIED ORGANISMS IN CHILDRENS FOOD.

The Connecticut Farm Bureau opposes Raised Bill No. 5300 AN ACT CONCERNING THE USE OF GENETICALLY MODIFIED ORGANISMS IN CHILDRENS FOOD. In 2013 The Connecticut General Assembly passed legislation which requires mandatory GMO labeling but it includes an important protection for our farmers, four other neighboring states with a population totaling twenty million people must adopt mandatory labeling law consistent with Connecticut before our law takes effect. This provision guards against Connecticut being on a "regulatory island" which would put our farmers at a competitive disadvantage. There is currently proposed legislation in Congress that would establish a national labeling program that would put all states on a level playing field which The Connecticut Farm Bureau supports.

We are concerned that food labeling that is specific to Connecticut will put our farmers at a competitive disadvantage and may make it difficult to sell our products out of state without entirely different packaging and labeling. The Connecticut Farm Bureau is supportive of farmers choosing whatever production techniques and marketing channels they choose to promote and grow their businesses. If farmers wish to produce certified organic or certified "GMO Free" we support and encourage them to do so. In fact we recognize that doing so for some farmers might help them meet an apparent growing segment of the market. We have already seen market forces provide products to consumers seeking "GMO Free". Consumers will increasingly be able to find products that meet their objectives through the existing system of certified voluntary labeling.

Our members have been engaged for years in supplying CT Grown products to our residents while continually diversifying their operations to take advantage of growing consumer demand. As a result more and more Connecticut farmers are engaged in value-added agriculture which often includes processing, packaging and selling their farm products directly to consumers. We are especially concerned about the impact this bill will have on this group of farmers. We believe that the bill has major flaws that would place undue burdens on all producers regardless of whether they produce products containing genetically engineered ingredients or not.

In addition the Bill creates a new classification of food called "Children's food" The definition included in the bill is so broad and ambiguous that virtually all food could be considered "Children's food". Specifically the bill calls for dairy products to be included in the definition. The inclusion of dairy products

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and the elimination of other important exemptions under the current GMO labeling law removes important protections and operational considerations contained in Sec.21a-92c.

The department of Consumer Protection it seems will be straddled with enforcement of this bill which will require them to monitor and investigate thousands of "retail" locations to ensure compliance. In addition they will need to develop a way to differentiate "Children's food" from "non-children's food" in retail settings and keep and administer different rules and regulations for each. The absence of a "produced with genetic engineering" label could mean either the product is not "Children's food", is not produced with genetic engineering OR it is "Children's food" that was produced with genetic engineering and not labeled correctly. Consumers and inspectors would not be able to differentiate between these. This is a major flaw of the bill and an area of great concern to Connecticut Farm Bureau. Consumer protection could spend huge amounts of staff time and money to investigate and or test every possible violation.

The Connecticut Farm Bureau feels this bill is both unworkable and unenforceable. We also feel that Raised Bill No. 5300 simply attempts to bypass the carefully considered trigger provisions contained in our existing mandatory GMO labeling bill as contained in Sec.21a-92c and we therefore encourage defeat of the bill.